Rakym Durham, : United States District Court

Plaintiff, : Eastern District of Pennsylvania

vs.

Officer Carr #1250 and Officer Clift #1259 : Civil Division – Civil Rights

Defendants. : Case No.: 2:20-cv-03944

PLAINTIFF'S REQUEST FOR AN EXTENSION OF FILING DEADLINES

 Plaintiff requests a time extension of 60 days for Discovery and all dispositive motions filings.

- 2. The Plaintiff requests this extension to conduct discovery based upon evidence learned during the current discovery period.
- 3. This time extension for finishing discovery based upon the new knowledge and the dates for dispositive motions will not affect this case and is not being done to gain a strategic advantage but to timely and efficiently process the case.
- 4. Defense Counsel does not object to this request.

Respectfully Submitted, CORNERSTONE LEGAL GROUP

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June 21, 2021